

EXHIBIT 6

From: [John Schiltz](#)
To: [Taylor Burgener](#)
Cc: [Evelyn McNaspy](#); [charley@pbatyler.com](#); [rcbunt@pbatyler.com](#); [Amy Hall](#); [Bryce T. Barcelo](#); [Andres Healy](#); [Chris Henry](#); [Kemper Diehl](#); [Matthew R. Berry](#); [Michelle Wimmer](#); [Alexandra Polin](#); [steve.ravel@kellyhart.com](#); [Apple-Arigna Service](#)
Subject: RE: Arigna Technology Limited v. Apple Inc. et al., WDTX-6-21-cv-00943: Venue Discovery Responses
Date: Thursday, May 26, 2022 10:07:00 PM

Taylor,

On May 19, Apple agreed to this deposition during a telephonic meet and confer. On May 20, Apple confirmed it in writing, and designated Mr. Rollins as its 30(b)(6) witness. On May 23, Apple stated Mr. Rollins was available to start the deposition at 12 pm. On May 25, Apple served responses and objections to our Rule 30(b)(6) notice, which again stated Apple would present a witness on May 27 at 12 pm. This morning, I spent more than an hour on the phone with you and John discussing those responses and objections—a call in which I narrowed some requests, Apple expanded some designations, and you agreed to get back to me on other issues. You never once suggested during that call that Apple would no longer present Mr. Rollins for deposition. Instead, you waited until 10:20 pm CT the night before the deposition to inform us of Apple’s changed position.

Further, although your email tries to scapegoat Arigna for this unreasonable conduct, we told you on [May 24](#) that Arigna would not present a Rule 30(b)(6) witness. We accepted your request to meet and confer about our position that same day and reiterated the same on the phone. We confirmed that position again on May 25—and expressly stated that we planned to depose Mr. Rollins on Friday, whether or not Apple also intended to designate him as its 30(b)(6) witness. Notwithstanding this history, Apple then served its responses and objections and formally confirmed tomorrow’s deposition (again). Your email is pretextual plain and simple.

The 30(b)(6) deposition of Apple is now just hours away. We intend to proceed as scheduled, so please inform Mr. Rollins that he is duty bound to appear for this deposition.

John Schiltz

Susman Godfrey LLP
1201 Third Avenue, Suite 3800 | Seattle, WA 98101
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This e-mail may contain privileged and confidential information. If you received this message in error, please notify me and delete it immediately. Thank you.

From: Taylor Burgener <burgener@fr.com>
Sent: Thursday, May 26, 2022 8:20 PM
To: John Schiltz <jschiltz@SusmanGodfrey.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatyler.com; rcbunt@pbatyler.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Andres Healy <AHealy@susmangodfrey.com>; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Matthew R. Berry <mberry@SusmanGodfrey.com>; Michelle

Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
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EXTERNAL Email

John,

We're disappointed that Arigna continues to refuse to provide Rule 30(b)(6) testimony entirely. As we've stated before and as is a fundamental principle in the law, discovery obligations are mutual. It is unreasonable and improper for Arigna to demand Apple's 30(b)(6) deposition—and even complain about Apple's reasonable narrowing of Arigna's topics and insist on holding open that deposition before it even occurs—when Arigna itself refuses to provide any Rule 30(b)(6) deposition of its own. As a result of Arigna's belated and continued refusal, Apple is forced to postpone its 30(b)(6) deposition until a mutual, equally-applicable resolution can be reached. Apple reserves all rights, including to seek relief from the Court for Arigna's discovery gamesmanship.

Best,

Taylor

From: John Schiltz <jschiltz@SusmanGodfrey.com>
Sent: Thursday, May 26, 2022 6:48 PM
To: Taylor Burgener <burgener@fr.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatlyer.com; rcbunt@pbatlyer.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; ahealy@susmangodfrey.com; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; mberry@susmangodfrey.com; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
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Taylor, John – we were expecting to hear from you by now regarding our meet and confer this morning on the objections you served last night for tomorrow's Rule 30(b)(6) deposition of Apple. Can you please advise when you plan to get back to us? Thank you.

John Schiltz

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From: John Schiltz
Sent: Thursday, May 26, 2022 8:49 AM
To: Taylor Burgener <burgener@fr.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatyler.com; rcbunt@pbatyler.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Andres Healy <AHealy@susmangodfrey.com>; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Matthew R. Berry <mberry@SusmanGodfrey.com>; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <apolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
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Done. Talk to you then.

John Schiltz
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From: Taylor Burgener <burgener@fr.com>
Sent: Thursday, May 26, 2022 8:16 AM
To: John Schiltz <jschiltz@SusmanGodfrey.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatyler.com; rcbunt@pbatyler.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Andres Healy <AHealy@susmangodfrey.com>; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Matthew R. Berry <mberry@SusmanGodfrey.com>; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
Subject: RE: Arigna Technology Limited v. Apple Inc. et al., WDTX-6-21-cv-00943: Venue Discovery Responses

EXTERNAL Email

Hi John,

We are unavailable at 9 am PST, but have availability at 10 am PST to discuss the 30(b)(6) topics. If that time works for you, please circulate a dial in.

Best,

Taylor

From: John Schiltz <jschiltz@SusmanGodfrey.com>
Sent: Thursday, May 26, 2022 10:42 AM
To: Taylor Burgener <burgener@fr.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatyler.com; rcbunt@pbatyler.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; ahealy@susmangodfrey.com; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; mberry@susmangodfrey.com; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
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Taylor,

Making sure you didn't miss the below. We need to get another time on the calendar this morning.

Thanks.

Sent from my iPhone

On May 26, 2022, at 6:00 AM, John Schiltz <jschiltz@susmangodfrey.com> wrote:

Taylor,

I apologize for the late notice, but I need to move this back. I can probably make 8:45, but 9 would be safer. I can do later this morning too if that's better for you. Just let me know.

Thanks for accommodating.

Sent from my iPhone

On May 25, 2022, at 5:02 PM, John Schiltz
jschiltz@susmangodfrey.com wrote:

That works. Thanks.

John Schiltz

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1201 Third Avenue, Suite 3800 | Seattle, WA 98101
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www.susmangodfrey.com

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From: Taylor Burgener <burgener@fr.com>
Sent: Wednesday, May 25, 2022 4:46 PM
To: John Schiltz <jschiltz@SusmanGodfrey.com>
Cc: Evelyn McNaspy <McNaspy@fr.com>; charley@pbatyler.com; rcbunt@pbatyler.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Andres Healy <AHealy@susmangodfrey.com>; Chris Henry <CHenry@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Matthew R. Berry <mberry@SusmanGodfrey.com>; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>; steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
Subject: Re: Arigna Technology Limited v. Apple Inc. et al., WDTX-6-21-cv-00943: Venue Discovery Responses

EXTERNAL Email

Hi John,

We are available tomorrow at 8 am PST. If that time works for you, please circulate a dial in.

Best,

Taylor

On May 25, 2022, at 7:18 PM, John Schiltz
jschiltz@susmangodfrey.com wrote:

[This email originated outside of F&R.]

Thank you. Counsel, please let us know when you are available tomorrow morning to meet and confer regarding these responses, so we can resolve any disputes in time for Apple's witness to be adequately prepared for Friday's deposition. I'll throw out 9 am PDT, but I am flexible. Thanks.

John Schiltz

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206-505-3845 | jschiltz@susmangodfrey.com
www.susmangodfrey.com

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From: Evelyn McNaspy <McNaspy@fr.com>
Sent: Wednesday, May 25, 2022 4:11 PM
To: charley@pbatlyer.com; rcbunt@pbatlyer.com; Amy Hall <AHall@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Andres Healy <AHealy@susmangodfrey.com>; Chris Henry <CHenry@susmangodfrey.com>; John Schiltz <jschiltz@SusmanGodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Matthew R. Berry <mberry@SusmanGodfrey.com>; Michelle Wimmer <MWimmer@susmangodfrey.com>; Alexandra Polin <APolin@susmangodfrey.com>
Cc: steve.ravel@kellyhart.com; Apple-Arigna_Service <Apple-Arigna_Service@fr.com>
Subject: Arigna Technology Limited v. Apple Inc. et al., WDTX-6-21-cv-00943: Venue Discovery Responses

EXTERNAL Email

Counsel,

Attached please find Apple's Objections and Responses to Arigna's Notice of 30(b)(6) Deposition Regarding Venue.

Thank you.

Evelyn McNaspy :: Legal Sec/Admin Trainer :: Fish & Richardson P.C.
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fr.com :: [Bio](#) :: [LinkedIn](#) :: [Twitter](#)

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